

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

NO. CR17-0203-JCC

PROTECTIVE ORDER

v.

ALEXANDRA SHELBURNE (a/k/a E.M.S.),
DARRYL KILGORE (a/k/a BRIAN
BURNETT), ROBIN PERRY, AMBER
OKHOMINA, FREDERICK JACKSON,
SUSAN KOLLER, STACIA QUARTO, and
ELIZABETH EVANS,

Defendants.

This matter having come before the Court on a stipulated motion for discovery protective order (Dkt. No. 85), the Court hereby GRANTS the motion and enters the following order, applicable only as to the stipulating parties:

DISCOVERY PROTECTIVE ORDER

A. Definitions

As used in this Order, the term “Protected Information” means any date of birth, Social Security number, driver’s license number, bank account number, credit card number, personal identification number, address, telephone number, name and/or location

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UNITED STATES ATTORNEY
700 STEWART ST., SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

1 of employment, criminal history record, background check, victim identity, and/or any
2 other similar information or number implicating a privacy interest of and belonging to an
3 individual, business, partnership, or corporation.

4 As used in this Order, the term “Protected Material” means any document or other
5 record containing or reflecting Protected Information.

6 **B. Permissible Disclosure of Protected Information and Protected Material**

7 The United States will make available copies of the Protected Material to defense
8 counsel to comply with the government’s discovery obligations. Possession of the
9 Protected Material is limited to defense counsel, their investigators, paralegals, assistants,
10 law clerks, and experts (“members of the defense team”).

11 Members of the defense team may not provide copies of the Protected Material to
12 other persons, including defendants themselves. Members of the defense team may
13 review Protected Information and/or Protected Material with defendants. The defendants
14 may visually inspect and review such documents but shall not be allowed to possess
15 Protected Information (such as unredacted copies of Protected Material, notes, copies, or
16 photographs of such Protected Material containing Protected Information). The
17 defendants may possess documents from which all Protected Information has been
18 redacted.

19 Members of the defense team may review or discuss the contents of documents
20 containing Protected Material with any prospective witness, as long as they do not share
21 the unredacted documents, or share any Protected Information with any prospective
22 witness.

23 **C. Filing**

24 If any Protected Information or Protected Material is filed in court or otherwise
25 disseminated as part of litigation, the parties shall redact such information prior to filing;
26 unless, based on a party’s application prior to filing, the Court finds that an unredacted
27 filing is necessary and appropriate.

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2 **D. Maintenance**

3 Members of the defense team shall keep any Protected Material secured whenever
4 the Protected Material is not being used in furtherance of their work in the above-
5 captioned case.

6 All documents containing Protected Material shall be returned to the
7 United States, or destroyed, once all charges are resolved by dismissal or by final
8 conviction. The provisions of this Order shall not terminate at the conclusion of this
9 prosecution.

10 **E. Modification**

11 The parties agree that this Protective Order may be modified, as necessary, by
12 filing with the Court a Stipulated Order Modifying the Protective Order, or by other order
13 of the Court.

14 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

15 DATED: September 8, 2017 /s/Marie M. Dalton

16 Attorney for Plaintiff United States of America

17 DATED: September 8, 2017 /s/Timothy R. Lohraff

18 Attorney for Defendant Alexandra Shelburne

19 DATED: September 8, 2017 /s/ Robert Flenbaugh

20 Attorney for Defendant Darryl Kilgore

21 DATED: September 8, 2017 /s/Catherine A. Chaney

22 Attorney for Defendant Frederick Jackson

23 DATED: September 8, 2017 /s/Cathy Gormley

24 Attorney for Defendant Stacia Quarto

25 DATED: September 8, 2017 /s/Gregory Geist

26 Attorney for Defendant Elizabeth Evans.
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1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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3 DATED this 19th day of September 2017.

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A handwritten signature in black ink, reading "John C. Coughenour", is written over a horizontal line.

JOHN C. COUGHENOUR
United States District Court Judge